

IX. PUBLICATION WAIVERS

Mines is not in the practice of waiving rights to publications as we endeavor to support the right to sharing of our research and scholarly endeavors and to preserve the FRE. If a waiver is requested, ORA in conjunction with the VPRTT will assist in the process. A form or documentation needs to be filled out whenever there is a restriction to publish dealing with export controls, restricted data sets in human subject research, intellectual property, or other reason that could be stated in a sponsored agreement.

If a PI has students working on a sponsored agreement involving a publication waiver, there is also an attached letter that they must sign attesting that the publication restriction will not adversely affect their studies at Mines. Contact ORA for further assistance.

X. TRAINING ON EXPORT CONTROLS

Mines provides training on export control laws and regulations upon request and through materials available to our community. Additional information and materials are available on the export web site or by contacting ORA and Office of Compliance. Contact ORA at 303-273-3411, ora@mines.edu, or see <http://inside.mines.edu/ORA-Home>; Contact Compliance Office at 303-384-2236 or compliance@mines.edu. These resources are available for scheduled training for small groups, departments, units, or others on request.

Additionally, Department of Commerce, BIS, has free resources regarding Export Control training, regulations, announcements, and decision trees. See <https://www.bis.doc.gov/index.php/compliance-a-training>.

XI. COMPLIANCE AUDITS

These procedures have been developed to ensure that appropriate reviews and documentation exist to provide evidence of compliance with the export laws and regulations. Export review records relating to sponsored projects are maintained in Mines ORA. Mines will maintain records of export reviews relating to travel and other miscellaneous reviews. Records will be kept for a period of five (5) years from the expiration date of the authorization or date an exemption is claimed, whichever is longer. If research project is involved, then the document should be retained for 5 years from the last date of funding and official close-out.

The PI/faculty/employee will also retain copies of any records relating to export controls for their files of all forms and associated documents during this five (5) year period.

[\[End of Sections\]](#)